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August 30, 2010

Judge Carol B. Amon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY

Re: United States of America v. Beverly Bonsu

10 CR 357


Dear Judge Amon,

We are requesting additional time to respond to the Presentence Investigation Report received by our office on August 25, 2010. Although the report says that we must respond within 14 days of receipt, I have tried to reach my client by phone several times, and have sent certified letters to her home with no response. Additionally, I have a scheduled family vacation so I will be out of the office from August 30, 2010 until September 7, 2010.

Although there are no legal objections to the report, I must confer with my client before responding with any factual objections. Therefore, I am requesting that the court allow additional time for the defense to confer with Ms. Bonsu regarding any factual errors in the report.

I have spoke to the AUSA Celia Cohen and Ms. Jill Polish the US Probation officer and neither has any objection to this request. Therefore, we would request additional time to meet with Ms. Bonsu until September 22, 2010.

Respectfully submitted,


Glenn Morak

So Ordered
The Honorable Carol B. Amon